

UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 )  
                                )  
v.                            ) Record #: 16-4291  
                                )  
Ruben Ceja-Rangel,        )  
                                )  
Defendant.              )

MOTION FOR LEAVE TO FILE OVERSIZED JOINT APPENDIX AND MOTION FOR  
EXTENSION OF TIME TO FILE INITIAL BRIEF

Counsel for Defendant Ruben Ceja-Rangel hereby respectfully requests permission to file an oversized appendix. In support of this motion, the Appellant states as follows:

1.       The joint appendix is oversized largely because it includes all trial testimony.
2.       This was a multi defendant trial that consisted of 2 trials (April-May 2015 consisting of 3 weeks and ending in a mistrial (hung jury) and then again in October 2015) hence all the testimony.
3.       Counsel for the State has requested the entire trial transcript which totals 2150 pages be included in the joint appendix.
4.       The joint appendix is approximately 3325 pages including covers and table of contents, which exceeds the limit under the rules. It includes only materials essential to the Court's evaluation of the issues.

In addition, the Opening Brief and Appendix are due today, December 12, 2016. However, due to the size of the joint appendix and the burden of binding and referencing such a large appendix, Counsel for Defendant hereby requests an additional 5 days to prepare and file the Opening Brief and Joint Appendix.

Respectfully submitted,

By: /s/ Aimee J. Zmroczek

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Columbia, South Carolina